## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:	Bankruptcy No. 17-12803-amc
Vivian Woodbury	Chapter 13
Debtor,	
REVERSE MORTGAGE SOLUTIONS, INC AS	
SERVICER FOR LIBERTY HOME EQUITY	
SOLUTIONS, INC. FKA GENWORTH FINANCIAL	
HOME EQUITY ACCESS, INC. ,	
Movant,	
v.	
Vivian Woodbury, and	
WILLIAM C. MILLER, Esq., Ch. 13 Trustee	
Respondents.	

## NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE

REVERSE MORTGAGE SOLUTIONS, INC AS SERVICER FOR LIBERTY HOME EQUITY SOLUTIONS, INC. FKA GENWORTH FINANCIAL HOME EQUITY ACCESS, INC. has filed a Motion for Relief from the Automatic Stay pursuant to 11 U.S.C. §362(d)(1); for costs and disbursements of this action, and for such other and further relief as to the Court may deem just and proper.

<u>Your rights may be affected.</u> You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult an attorney.)

- 1. If you do not want the court to grant the relief sought in the motion or if you want the court to consider your views on the motion, then on or before June 7, 2018, (seventeen (17) days after the date of service below in accordance with Local Rules and Procedures of this Court), you or your attorney must do <u>all</u> of the following:
  - (a) File a response in person or via mail with the Clerk explaining your position at United States Bankruptcy Court, Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Suite 214 Philadelphia, PA 19107.

If you mail your response to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) Mail a copy to the movant's attorney:

6409 Congress Avenue, #100 Boca Raton, FL 33487 -and 130

Clinton Road, Suite 202 Fairfield, NJ 07004

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief requested in the motion.
- 3. A hearing on the motion is scheduled to be held before the Honorable Ashely M. Chan on June 12, 2018, at 11:00 am at Robert N.C. Nix Sr. Federal Courthouse 900 Market Street, Courtroom #5, Philadelphia, PA 19107.
- 4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been cancelled because no one filed a response.

Dated: 5.21.18

Robertson, Anschutz & Schneid, PL 6409 Congress Avenue, #100 Boca Raton, FL 33487 -and 130 Clinton Road, Suite 202 Fairfield, NJ 07004 Tel: (561) 241-6901 Fax: (561) 241 -1969

By: /s/ Kevin Buttery Kevin Buttery, Esquire PA I.D. 319438 kbuttery@rascrane.com